

REMARKS

Claims 1-14 and 19-25 are pending in the present application and stand rejected.

The Examiner's reconsideration is respectfully requested in view of the following remarks.

Claims 1, 4-9, 11-13, 19, 20, 24 and 25 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Zaharkin (U.S. Patent Application Publication No. 2002/0147747) (hereinafter "Zaharkin").

Claims 2, 3, 22 and 23 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Zaharkin, in view of Sorge et al. (U.S. Patent No. 6,613,098) (hereinafter "Sorge").

Claims 10, 14 and 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Zaharkin. The above rejections are respectfully traversed.

Regarding independent claims 1 and 24, the Office Action relies on p. 2, paras. 25, 34, 36, 37 and p. 4, para. 57 of Zaharkin as disclosing "parsing said input document and collating elements of said input document into a *hierarchically ordered structure*." The "mapping file," as disclosed in the recited portion of Zaharkin, include one or more nodes, each of which represent a possible mapping of an element of document type definition to a portion of the document. Candidate paths and associated scores of the candidate paths are generated from one node to another. Candidate paths themselves may be parsed against the DTD by traversing the tree structure of the DTD, comparing a candidate path to the DTD, and determining if the candidate is valid or not. However, nothing in the recited portion of Zaharkin discloses "parsing said input document and collating elements of said input document into a *hierarchically ordered structure*," as claimed in claims 1 and 24.

Regarding independent claim 19, the Office Action fails to address “a management processor for determining transformation parameters *in response to input data identifying a selected second format for presentation on a display device.*” It is reminded that the Office Action must address each *and* every limitation of the claims. Nevertheless, the recited portion of Zaharkin does not disclose “a management processor for determining transformation parameters *in response to input data identifying a selected second format for presentation on a display device,*” as claimed in claim 19.

Accordingly, claims 1, 19 and 24 are believed to be patentably distinguishable over Zaharkin. Dependent claims 2-14, 20-21 and 25 are believed to be allowable for at least the reasons given for claims 1, 19 and 24. Withdrawal of the claim rejections of claims 1-14, 19-21 and 24-25 is respectfully requested.

Regarding independent claim 22, the Office Action relies on col. 12, lines 35-67 to col. 13 lines 1-34 of Sorge as teaching “resolving conflicts arising *due to said transformation parameters* in accordance with predetermined conflict resolution rules to produce *compatible transformation parameters.*” The recited portion of Sorge relates to resolving formatting conflicts between displaying a table of data on a spreadsheet program (e.g., EXCEL 2000) and a browser program. The type of formatting conflict disclosed in Sorge is patentably distinguishable from conflicting or incompatible transformation parameters, as essentially claimed in claim 22. In Sorge, the formatting conflicts exist *not* in the transformation parameters, but rather in the differences between the way the programs display spreadsheet data. This is supported further because Sorge does not produce “*compatible transformation parameters.*” Thus, assuming, *arguendo*, that the references are properly combined, the combination of Sorge and Zaharkin does not teach

or suggest “resolving conflicts arising *due to said transformation parameters* in accordance with predetermined conflict resolution rules to *produce compatible transformation parameters*,” as claimed in claim 22.

Accordingly, claim 22 are believed to be patentably distinguishable and nonobvious over the combination of Zaharkin and Sorge. Dependent claim 23 is believed to be allowable for at least the reasons given for claim 22. Withdrawal of the rejection of claims 22-23 is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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